

HERNANDEZ ET AL V. ROSA VPTAN LTD 2:20 CV 04026

RE: Michael Tizzano



JMA-SIL

June 13, 2024 4:18 PM

Shirley Navarr... and 1 recipient

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I need you guys to produce those for me, you are putting in the trial order as exhibits, elements and citations, so you should have them handy, I have no means on how to research.

Thanks.

EXHIBIT A

----- Original message -----

From: Shirley Navarro-Losito

<shirleylosito@moserlawfirm.com>

Date: 6/13/24 [1:10 PM](#) (GMT-05:00)

To: michaelcapri

<michaelcapri@optonline.net>, Steven

Moser

<steven.moser@moserlawfirm.com>

Subject: RE: Michael Tizzano



Re: Michael Tizzano



June 13, 2024 9:56 PM

Steven Moser and 1 recipient

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It's not my job to research what you include as exhibits, citations, elements. You must disclose what you intend to present at trial, regardless if I have showed the ability to perform a research. I wait till Tuesday, then I will let the judge know about this.
Thanks.

----- Original message -----

From: Steven Moser

<steven.moser@moserlawfirm.com>

Date: 6/13/24 [5:02 PM](#) (GMT-05:00)

To: michaelcapri

<michaelcapri@optonline.net>, Shirley

Navarro-Losito

<shirleylosito@moserlawfirm.com>





Re: Michael Tizzano



June 13, 2024 10:23 PM

Steven Moser and 1 recipient

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Ok, when you do please email them to me before Tuesday June 18th.

I need to see how the cases/codes/citations etc you refer to relate to the case.

Thanks.

Sent from my T-Mobile 5G Device

----- Original message -----

From: Steven Moser

<steven.moser@moserlawfirm.com>

Date: 6/13/24 [10:00 PM](#) (GMT-05:00)

To: michaelcapri



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Michael Tizzano



June 13, 2024 11:44 AM

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I would also need all the Elements and copies of cases Mr. Moser refers to (citations) and the codes/rules he refers to in regards to NYLL and Fsla.

Thanks

Sent from my T-Mobile 5G Device



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